

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

IMPULSARIA, LLC,)	
a Nevada Limited Liability Company)	
)	
Plaintiff,)	Case No. 1:11-cv-01220-RHB
v.)	
)	Hon. Robert Holmes Bell
United Distribution Group, LLC, dba United)	
Wholesale Grocery; Mine Boutique LLC; and)	
Purple Haze II, LLC; all Michigan Limited)	
Liability Companies;)	
and)	
Cin-Lan, Inc.; Fashion Designs, Inc.; Executive)	
Art Studio, Inc.; G.K. Convenience Stores, Inc.;)	
Ajit Corporation; Gur-Zal, Inc.; Capital Sales)	
Company; and Yatin Entertainment, Inc.; all)	
Michigan Corporations;)	
and)	
Premiere Sales Group; a California corporation;)	
and)	
eCRATER; a California company;)	
and)	
www.2davdietmaxsupply.com; a Florida company;)	
and)	
Pure Vitamins & Natural Supplements, LLC; a)	
Florida limited liability company;)	
and)	
Karma Global Enterprises, Inc.; Import Warehouse,)	
Inc., and Starco Impex, Inc.;)	
www.thriftywholesaler.com, all Texas companies;)	
and)	
Ejuice USA Import Export and Distribution LLC;)	
a Virginia limited liability company;)	
and)	
Star Importers and Wholesalers; a Georgia company))	
and)	
S&N Enterprises, Inc. of Virginia; a Virginia)	
corporation;)	
and)	
Sunshine Films, Inc., a California corporation;)	
and)	
E&A Video & Magazine, a New Jersey company;)	
and)	
Max Distributors, Inc., a New Jersey corporation;)	
and)	

hM Distributors, a Georgia company;)
 and)
 CB Distributors, Inc., an Illinois company;)
 and)
 GIMIX, Inc., a Florida corporation;)
 and)
 Triangle Wholesale, Inc.; an Illinois corporation;)
 and)
 Captiol News Agency Co., an Illinois corporation;)
 and)
 ANRPG LLC, a New Jersey, a limited liability)
 company, dba Adult Content Factory, New)
 Pandemonium, Forbidden Media, New Release)
 Distributors and aka Adult New Release Preview)
 Guide, LLC, a New Jersey limited liability company;)
 and)
 Price Rite Shopping Group, LLC, a New Jersey)
 limited liability company;)
 and)
 SLK Distributors, LLC, a Georgia limited liability)
 company;)
 and)
 Unique Medium, LLC/One Big Willy, a New York)
 limited liability company;)
 and)
 Mistoo Party World, LLC, a Michigan limited)
 liability company;)
 and)
 Empire Distributors, Inc., an Illinois corporation;)
 and)
 Wholesale Products and Entertainment, LLC, a)
 New Jersey limited liability company;)
 and)
 William Sellers, an Alabama resident;)
 and)
 Emiliano Vega, Emiliana Vega, Milo Vega, Emilio)
 Vega, Dr. Ken K. Kissa, and Rick Hendrick, all)
 Florida residents;)
 and)
 Willy Alejo, a New Jersey resident;)
 and)
 Blake King, a New York resident;)
 and)
 Rakesh Kumar, a Michigan resident;)
 and)
 Anees Dadwani and Ravi Bhatia, both Texas residents;)
 and)

Defendant Ravi Bhatia hereby moves this Honorable Court for an order dismissing the Third Amended Complaint of Plaintiff Impulsaria, LLC as to Mr. Bhatia individually pursuant to Fed.R.Civ.P. 12(b)(2) for lack of personal jurisdiction.

A Memorandum in support of this motion and a Proposed Order are filed herewith.

Pursuant to Local Rule 7.1(d), undersigned counsel for Defendant Ravi Bhatia, Terence J. Linn, conferred by telephone on February 2, 2012 with counsel for Impulsaria, LLC, Eric Hultman, regarding dismissal of the complaint against Mr. Bhatia. Counsel for Impulsaria, LLC indicated that he could not then state whether the present motion would be opposed.

Dated: February 2, 2012

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Certificate of Service

I hereby certify that on February 2, 2012, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF.

/Terence J. Linn/
Terence J. Linn